

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:)
JOHN A. D'ANDREA, JR.,) Bankruptcy No.: 19-10865
Debtor.) Chapter 13
)
) Related to Doc. No. 10
US BANK TRUST NATIONAL)
ASSOCIATION, AS TRUSTEE OF THE)
CHALET SERIES III TRUST,)
)
)
Movant,)
v.)
)
JOHN A. D'ANDREA, JR.,)
)
)
Respondents.)

OBJECTION TO DEBTORS' CHAPTER 13 PLAN
DATED JANUARY 18, 2019

US Bank Trust National Association, as Trustee of the Chalet Series III Trust (the "Movant"), by and through its undersigned counsel, files this Objection to the Ch. 13 Plan Dated January 18, 2019 and in support thereof, avers as follows:

1. On or about February 11, 2019, John A. D'Andrea, Jr. ("Debtor") filed a Chapter 13 bankruptcy case at the above-captioned bankruptcy number.
2. The Debtor is the owner of real estate located in Middleton Township identified as Tax Parcel No. 22/62/305 and known as 26 Cliff Road, Levittown, Pennsylvania 19057 (the "Property").
3. On April 3, 2019, the Movant filed a secured proof of claim at Claims Register No. 4-1 with respect to delinquent payments due to Movant under a note that is secured by a mortgage lien against the Property. This claim showed an outstanding payoff of \$206,312.57 and an arrears balance of \$25,037.62 as of the date that this bankruptcy was filed.

4. On February 19, 2019 the Debtors filed a Chapter 13 Plan dated January 18, 2019 (the "Plan").

5. The Plan provides to pay \$17,889.00 towards the arrears balance of Movant's secured claim.

6. The Movant objects to confirmation of the Plan because it fails to provide for payment in full of the Movant's secured claim. See 11 U.S.C. § 1325(a)(5)(a)-(b).

WHEREFORE, the Movant, US Bank Trust National Association, as Trustee of the Chalet Series III Trust, requests this Honorable Court to enter an Order denying confirmation of the Debtors' Chapter 13 Plan dated January 18, 2019.

Dated: April 26, 2019

Respectfully submitted,

Mester & Schwartz, P.C.

/s/ Jason Brett Schwartz

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